

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF MISSISSIPPI  
DELTA DIVISION**

**ZUNDRIA D. CRAWFORD**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 2:06CV125-MPM-EMB**

**BAXTER HEALTHCARE CORPORATION**

**DEFENDANT**

**MOTION TO COMPEL PLAINTIFF TO SERVE PLAINTIFF'S SECOND  
SUPPLEMENTAL ANSWERS AND OBJECTIONS TO DEFENDANT'S  
FIRST SET OF INTERROGATORIES**

Defendant Baxter Healthcare Corporation moves the Court for an order requiring Plaintiff Zundria Crawford to comply with the Notice of Service she filed on December 19, 2007, by serving "Plaintiff's Second Supplemental Answers And Objections To Defendant's First Set Of Interrogatories." In support of this motion, Baxter would show as follows:

1. On December 19, 2007, Plaintiff filed a Notice of Service certifying that she served "Plaintiff's Second Supplemental Answers And Objections To Defendant's First Set Of Interrogatories" on Baxter on that date. (See Docket No. 48).

2. On January 2, 2008, Baxter's counsel wrote to Plaintiff's counsel, informed him that Baxter had not received "Plaintiff's Second Supplemental Answers And Objections To Defendant's First Set Of Interrogatories," and asked that he forward a copy of those discovery responses as soon as possible. (See Vance Declaration at ¶ 4 and Ex. A, attached to this Motion as Exhibit "1").

3. On January 9, 2008, when Baxter had not received a copy of "Plaintiff's Second Supplemental Answers And Objections To Defendant's First Set Of Interrogatories," Baxter's counsel wrote to Plaintiff's counsel a second time and asked that he forward a copy of those discovery responses. (See Vance Declaration at ¶ 5 and Ex. B, attached to this Motion as Exhibit "1").

4. On January 16, 2008, Baxter's counsel wrote to Plaintiff's counsel a third time, informed him that Baxter still had not received those discovery responses and asked that Plaintiff's counsel either forward the responses or sign and return the enclosed Good Faith Certificate by the following day. To date, Baxter's counsel has not received "Plaintiff's Second Supplemental Answers And Objections To Defendant's First Set Of Interrogatories," or any other response from Plaintiff to this correspondence. (See Vance Declaration at ¶¶ 6-7 and Ex. C, attached to this Motion as Exhibit "1").

5. Baxter respectfully requests that the Court order Plaintiff to comply with the Notice of Service she filed on December 19, 2007, and serve "Plaintiff's Second Supplemental Answers And Objections To Defendant's First Set Of Interrogatories" on Baxter Healthcare Corporation.

6. Based on the nature of this motion, Baxter respectfully requests that it be excused from the requirement of submitting a supporting memorandum of authorities.

WHEREFORE, PREMISES CONSIDERED, Baxter Healthcare Corporation respectfully requests that the court enter an order requiring Plaintiff to comply with the Notice of Service she filed on December 19, 2007, and serve "Plaintiff's Second Supplemental Answers And Objections To Defendant's First Set Of Interrogatories" on Baxter Healthcare Corporation.

Respectfully submitted,

BAXTER HEALTHCARE CORPORATION,  
Defendant

BY: /s/ Alison Tasma Vance  
PAULA GRAVES ARDELEAN (MSB# 4975)  
ALISON TASMA VANCE (MSB#101113)

ITS ATTORNEYS

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**CERTIFICATE OF SERVICE**

I, Alison Tasma Vance, attorney for Defendant Baxter Healthcare Corporation, hereby certify that on this day I filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following registered attorneys:

Brandon I. Dorsey, Esquire  
Brandon I. Dorsey, PLLC  
Attorney At Law  
Post Office Box 13427  
Jackson, Mississippi 39236-3427

ATTORNEY FOR PLAINTIFF

SO CERTIFIED, this the 18<sup>th</sup> day of January, 2008.

/s/ Alison Tasma Vance  
ALISON TASMA VANCE